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7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
11)
Plaintiff,) **STIPULATION AND ORDER TO CONTINUE**
12) **STATUS CONFERENCE AND EXCLUDE TIME**
vs.)
13) Date: June 28, 2022
JOSHUA WILSON and) Time: 9:30 a.m.
14 CODY CRAMER,) Judge: Hon. John A. Mendez
15)
Defendants.)

16 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
17 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for
18 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
19 Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
20 Cramer that the status hearing currently set for June 28, 2022 at 9:30 be continued to September
21 27, 2022 at 9:30 a.m.

22 The parties specifically stipulate as follows:

- 23 1. By previous order, this matter was set for a status on June 28, 2022 at 9:30 a.m.
24 2. By stipulation, Mr. Wilson now moves to continue the status conference to
25 September 27, 2022 at 9:30 a.m.
26 3. To date, the government has produced approximately 850 pages and various
27 audio/video recordings of discovery to the defendants.
28

- 1 4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
2 investigate and research possible defenses, research potential pretrial motions, and
3 explore potential resolutions to the case, and otherwise prepare for trial.
- 4 5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
5 would deny them the reasonable time necessary for effective preparation, taking
6 into account the exercise of due diligence.
- 7 6. Neither the government nor Mr. Cramer object to the continuance.
- 8 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
9 Act), the parties request that the time period between June 28, 2022 and
10 September 27, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §
11 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
12 granted by the Court at the defense's request, based on a finding that the ends of
13 justice served by granting the continuance outweighs the best interest of the
14 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

15 Respectfully submitted,

16 HEATHER E. WILLIAMS
17 Federal Defender

18 Date: June 23, 2022

/s/ Hootan Baigmohammadi
 HOOTAN BAIGMOHAMMADI
 Assistant Federal Defender
 Attorneys for Mr. Wilson

21 Date: June 23, 2022

/s/ Kyle Knapp
 Kyle Knapp
 Attorney for Mr. Cramer

24 Date: June 23, 2022

 PHILLIP A. TALBERT
 United States Attorney

26 /s/ James R. Conolly
27 James R. Conolly
 Assistant United States Attorney
28 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: June 24, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE